



U.S. Department of Justice

United States Attorney  
Southern District of New York

**MEMO ENDORSED**

86 Chambers Street  
New York, New York 10007

June 15, 2023

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/16/2023

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*,  
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State (“State Department”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). On behalf of the government, and together with the plaintiffs, I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from June 19 to August 18, 2023), that the pretrial conference currently scheduled for June 30, 2023, be adjourned *sine die*, and that the parties be permitted to submit a joint update letter by August 17, 2023. This is the second request by either party to for an extension of time to respond to the complaint and adjourn the pretrial conference.

The reason for this request is that the parties are discussing the status of the case in light of the Government’s April 24, 2023 letter to plaintiffs advising that no responsive documents were found. The parties have been discussing the Government’s response and whether the case can be resolved without further Court intervention. We thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendant*

By: /s/ Joseph A. Pantoja  
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cc: *Plaintiffs’ counsel* (by ECF)

Application GRANTED. The initial pretrial conference scheduled for June 30, 2023, and Defendant's deadline to respond to the complaint, are hereby ADJOURNED *sine die*. The parties must provide a joint status update by no later than **August 17, 2023**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over a horizontal line.

Date: 6/16/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE